

ORIGINAL



0000069873

RANCHO DEL CONEJO COMMUNITY WATER CO-OP., INC.

13130 West Rudasill Road

Tucson, AZ 85743

Phone/Fax: (520) 682-8335

March 12, 2007

Ernest G. Johnson, Director
Utilities Division
Arizona Corporation Commission
400 West Congress Street
Tucson, AZ 85701-1347

RE: RW-00000B-07-0051 Water Rulemaking

Gentlepersons ~

Thank you for the opportunity to review and comment on the draft rule changes. While the bulk of the changes seem reasonable, several would constitute a substantial burden to small water cooperatives like ourselves. Please bear in mind that we serve about 325 families, and are a volunteer Board of Directors and not experts in water regulation.

Item 2. ii. calls for land ownership boundaries and acreage of parcels within the service area when applying for a CCN extension. We have no way of ascertaining that without hiring someone to do the research, an unplanned expense we can ill afford. With only a part-time office manager, it would also be difficult to comply with 2. k, l, and m, soliciting each landowner's response, etc.

Item 2 v. i. is also of concern. As you know, many water companies in Arizona are struggling to comply with the EPA-mandated reduction in arsenic levels. The process of testing, researching, soliciting bids, applying for a WIFA loan to purchase a remediation system and securing an ACC rate increase to pay for it all is a long and daunting process, especially for small non-profit co-ops like ourselves. To obtain a compliance notice from ADEQ within 30 days of filing an application for extension seems, on its face, unreasonable and unworkable.

Thank you for the opportunity to comment.

Sincerely,

Albert V. Lannon

President

Rancho Del Conejo Community
Water Cooperative, Inc.

Arizona Corporation Commission
DOCKETED

MAR 28 2007

DOCKETED BY	nr
-------------	----

RECEIVED

MAR 28 11:44

ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

47